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4 Attorney for Material Witness/es

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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**  
10

11 UNITED STATES OF AMERICA,	)	Crim. Case No. 08cr2125-WQH
	)	
12 Plaintiff,	)	EX PARTE NOTICE OF MOTION AND
	)	MOTION FOR ORDER SHORTENING TIME
13 v.	)	
	)	DATE: August 7, 2008
14 ROBERTO JAYME MEDINA, et al.,	)	TIME: 9:00 a.m.
	)	MAJ. JUDGE: Ruben B. Brooks
15 Defendants.	)	
	)	

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17 TO KAREN P. HEWITT, UNITED STATES ATTORNEY, AND TO THE ATTORNEYS OF  
18 RECORD FOR THE ABOVE-NAMED DEFENDANTS:

19 PLEASE TAKE NOTICE that on August 7, 2008, at 9:00 a.m., or as soon thereafter as counsel  
20 may be heard, material witnesses CONRADO ARTEAGA-RODRIGUEZ and JORGE ESTRADA-  
21 CEJA (hereinafter, "Material Witnesses") by the through their counsel, Tamara D. DeHaan, will bring a  
22 motion for an order to shorten time to file a motion to set videotaped depositions of the Material  
23 Witnesses.

24 **MOTION**

25 The Material Witnesses, by and through their counsel, Tamara D. DeHaan, Esq., and pursuant to  
26 Federal Rules of Criminal Procedure, Rules 28, 29, and 30, hereby move this court for an order  
27 shortening time for filing and serving a notice of motion and motion to take their depositions by  
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1 videotape, to three (3) days, to be heard on August 7, 2008, at 9:00 a.m., or as soon thereafter as counsel  
2 may be heard.

3 The motion for an order to shorten time is based on the fact the Material Witnesses are unable to  
4 meet any condition of bail, and have been in custody since June 9, 2008. If this motion is not heard at  
5 the earliest possible date and prior to a date with the usually required notice, the incarcerated Material  
6 Witnesses will languish in custody for an excessive period of time in contravention of their legal rights.

7 This motion is based upon this Notice, the Declaration of Tamara D. DeHaan, Esq., the files and  
8 records in the above-entitled cause, and any and all other information that may be brought to the Court's  
9 attention prior to or during the hearing on this motion.

10 Respectfully submitted,

11  
12 DATED: 8/5/08

LAW OFFICES OF TAMARA D. DeHAAN

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14 By: s/Tamara D. DeHaan  
15 Tamara D. DeHaan  
16 Attorney for Material Witnesses  
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Attorney for Material Witness/es

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

(Honorable Ruben B. Brooks)

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERTO JAYME MEDINA, et al.,

Defendants.

Criminal Case No. 08cr2125-WQH

**DECLARATION OF SERVICE**

Person/s Served: Erick Guzman, Esq.  
Holly Hanover, Esq.  
And U.S. Attorney

Date of Service: August 5, 2008

Under penalty of perjury, I declare:

1. I am an attorney duly licensed to practice law in the State of California. I am admitted to practice before the United States District Court for the Southern District of California. I am over the age of eighteen years and not a party to this action.

2. On August 5, 2008, I served the above-named person/s with the following documents: Ex Parte Application for Order Shortening Time, Notice of Motion and Motion for Video Taped Deposition of Material Witnesses, Memorandum of Points and Authorities in Support of Motion, Declaration of Tamara D. DeHaan, Esq., in Support of Motion, and Proposed Order.

3. Service was effected by e-filing the document with the Southern District Court via CM/ECF.

Executed on August 7, 2008 at San Diego, California.

s/Tamara D. DeHaan  
Tamara D. DeHaan, Esq. - Declarant